



**Service of Process
Transmittal**

01/22/2018

CT Log Number 532657313

TO: Sara Miemiec, Litigation Director ACCIDENT CLAIMS
SCHNEIDER NATIONAL, INC.
3101 South Packerland Drive
Green Bay, WI 54304-

RE: Process Served in Texas

FOR: SCHNEIDER NATIONAL CARRIERS, INC. (Domestic State: NV)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Maria Beatification Ambriz Piedra, etc., Pltf. vs. Christopher Mitchell Webb and Schneider National Carrier, Inc., Dfts.

DOCUMENT(S) SERVED: Letter, Petition, Return

COURT/AGENCY: 253rd Judicial District Court Chambers County, TX
Case # CV1712825

NATURE OF ACTION: Personal Injury - Vehicle Collision - 08/05/2017

ON WHOM PROCESS WAS SERVED: C T Corporation System, Dallas, TX

DATE AND HOUR OF SERVICE: By Process Server on 01/22/2018 at 15:25

JURISDICTION SERVED : Texas

APPEARANCE OR ANSWER DUE: Within 20 days after you were served this citation and petition

ATTORNEY(S) / SENDER(S): Nhan Nguyen
Law Office of Nhan Nguyen
2500 West Loop South, Suite 340
Houston, TX 77027
713-840-7200

ACTION ITEMS: CT has retained the current log, Retain Date: 01/23/2018, Expected Purge Date: 01/28/2018

Image SOP

Email Notification, Allicia DeLeon deleona1@schneider.com

Email Notification, Connie Fleigle fleiglec@schneider.com

Email Notification, Kerry Byng byngk@schneider.com

Email Notification, Meghan Hellmann hellmannm@schneider.com

SIGNED: C T Corporation System

ADDRESS: 1999 Bryan Street
Suite 900
Dallas, TX 75201

TELEPHONE: 214-932-3601

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Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

EXHIBIT A

CLERK OF THE COURT
Donna G. Brown, District Clerk
1923 Sam Houston, Room 115
Liberty, Texas 77575

ATTORNEY FOR PLAINTIFF OR PLAINTIFF'(S)
NHAN NGUYEN
2500 WEST LOOP SOUTH, SUITE 340
HOUSTON, TEXAS 77027

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

THE STATE OF TEXAS

TO: Schneider National Carriers, Inc., by and through its registered agent CT Corporation System, Respondent, Greetings;

You are hereby commanded to appear by filing a written answer to the Petitioner's Original Petition and Request for Disclosure to Defendants at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **253RD JUDICIAL DISTRICT COURT** of Liberty County, Texas at the Court House of said County in Liberty, Texas.

Said Petitioner's Petition was filed in said court on the 21st day of December, 2017, in this cause, Numbered **CV1712825** on the docket of said court, and styled, MARIA BEATIFICACION AMBRIZ PIEDRA, INDIVIDUALLY AND AS NEXT FRIEND OF J.B., B.B., AND R.B., Plaintiff vs. CHRISTOPHER MITCHELLE WEBB AND SCHNEIDER NATIONAL CARRIERS, INC., Defendant.

The nature of Petitioner's demand is fully shown by a true and correct copy of Petitioner's Original Petition and Request for Disclosure to Defendants, accompanying this citation and made a part hereof.

The Officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at Liberty, Texas, this the 27th day of December, 2017.

Attest Donna G. Brown, Clerk, District Court
Donna G. Brown, District Clerk
Liberty County, Texas

By Dolores Wiley, Deputy
Dolores Wiley

1-22-18
ctharp
PSC 222

SHERIFF'S RETURN

Came to hand on _____ day of _____, 201____, at _____ o'clock _____ M., and executed in _____ County, Texas by delivering to each of the within-named _____, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the Plaintiff's Petition, at the following times and places, to wit:

Name	Date			Time			Place, and Course and Distance From Court House
	Month	Day	Year	Hour	Min.M.	

And not executed as to the Respondent, _____ the diligence used _____ in _____ finding _____ said _____ Respondent, _____ being: _____ and the cause of failure to execute this process is: _____ and the information received as to the whereabouts of the said Respondent, being: _____

FEES — Serving _____ Copy _____ \$ _____
Total \$ _____

_____ Sheriff/Constable, Precinct

County, Texas
By _____,
Deputy

CERTIFICATE OF DELIVERY

I, do hereby certify that I delivered to _____, Defendant on the _____ day _____, 201____, at _____ o'clock _____ M. a copy of this instrument.

Precinct # _____ Sheriff/Constable,
By _____, Deputy

FILED
12/21/2017 1:56 PM
Donna G. Brown
District Clerk
Liberty County, TX
Dolores Wiley

CAUSE NO. CV1712825

MARIA BEATIFICACION	§	IN THE DISTRICT COURT OF
AMBRIZ PIEDRA, Individually and as	§	
Next Friend of J.B., B.B., and R.B.,	§	
Minor Children,	§	
	§	
<i>Plaintiff,</i>	§	
	§	LIBERTY COUNTY, TEXAS
VS.	§	
	§	
CHRISTOPHER MITCHELL WEBB; and	§	
SCHNEIDER NATIONAL CARRIERS,	§	
INC.,	§	
	§	
<i>Defendants</i>	§	253rd DISTRICT COURT

**PLAINTIFF'S ORIGINAL PETITION AND
REQUEST FOR DISCLOSURE TO DEFENDANTS**

TO THE HONORABLE DISTRICT COURT JUDGE:

Plaintiff MARIA BEATIFICACION AMBRIZ PIEDRA, Individually and as Next Friend of J.B., B.B., and R.B., Minor Children complains of Defendants CHRISTOPHER MITCHELL WEBB; and SCHNEIDER NATIONAL CARRIERS, INC. (collectively, the "Defendants"), and in support would show this Court the following:

LEVEL

1. Plaintiffs intend to conduct discovery under Level 2 of Rule 190.3 of the Texas Rules of Civil Procedure and affirmatively plead that this suit does not fall under the expedited-actions process of Rule 169, because Plaintiffs seek damages in excess of \$100,000.

RELIEF

2. Plaintiffs seek only monetary relief of over \$200,000 but less than \$1,000,000. Tex. R. Civ. P. 47(c)(4).

PARTIES

3. Plaintiff is a resident of Harris County, Texas.

4. Defendant CHRISTOPHER MITCHELL WEBB is, upon information and belief, an individual who may be served with process at his residence address, 3217 Joselin Lane, Apt. B, Red Bank, Tennessee 37415.

5. Defendant SCHNEIDER NATIONAL CARRIERS, INC. is, upon information and belief, a Nevada corporation that may be served with process by serving its registered agent, C.T. Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

VENUE

6. Pursuant to §§15.002 *et seq.* of the Texas Civil Practice and Remedies Code, venue is proper in Harris County, because the cause of action accrued in Liberty County, Texas.

FACTS

7. This lawsuit results from a collision that occurred in Harris County, Texas. On the morning of August 5, 2017, Plaintiff Maria Beatificacion Ambriz Piedra ("Plaintiff" or "Ambriz") was stopped at the red light at the intersection of State Highway 321 and East Linney Street in Dayton, Texas. Her three minor children were passengers in the vehicle. Suddenly and without any warning, vehicles operated by Defendant Christopher Mitchell Webb ("Webb") and Charles Edward Gates ("Gates") collided in the intersection, causing Gates' vehicle to crash nearly head-on into Plaintiff's vehicle (the "Collision").

NEGLIGENCE

8. Webb committed acts of omission and/or commission which, collectively and severally, constituted negligence, which was a proximate cause of the Collision. Webb's negligent acts include, but are not limited to, inattention, failure to yield the right-of-way, failure to take evasive action, failure to control speed, and failure to obey the traffic laws and signals of the State of Texas.

RESPONDEAT SUPERIOR

9. At the time of the Collision, Webb was acting in the course and scope of his employment with Defendant Schneider National Carriers, Inc. ("Schneider"), and operating a vehicle owned by Schneider. Under the doctrine of *Respondeat Superior*, Schneider is jointly and severally liable for all acts of Webb's negligence.

DAMAGES

10. As a result of Defendants' negligence, Plaintiff's vehicle was damaged and she has been deprived of the use of her vehicle since the Collision.

11. Further, Plaintiff Maria Beatificacion Ambriz Piedra and her children sustained serious injuries and incurred medical expenses for the necessary diagnosis and treatment of their injuries. These charges are reasonable and customary with charges made for such services in the county or counties where they were provided. With reasonable medical probability, Plaintiff will incur medical expenses for the necessary treatment of their injuries in the future. Further, Plaintiff Maria Beatificacion Ambriz Piedra and her children have suffered physical pain, mental anguish, and physical impairment resulting from their injuries, and are expected to suffer therefrom in the future.

PRAYER

Plaintiff MARIA BEATIFICATION AMBRIZ PIEDRA, Individually and as Next Friend of J.B., B.B., and R.B., Minor Children prays that Defendants CHRISTOPHER MITCHELL WEBB; and SCHNEIDER NATIONAL CARRIERS, INC. appear herein, and that upon final trial Plaintiff take a judgment against Defendants, jointly and severally, for the following:

- (a) Actual damages in an amount within the jurisdictional limit of the court;
- (b) Costs of court;
- (c) Prejudgment and post-judgment interest at the highest lawful rate; and

(d) Such other and further relief, both general and special, to which Plaintiff may show herself entitled.

REQUEST FOR DISCLOSURE

Under Rule 194 of the Texas Rules of Civil Procedure, Plaintiff requests that Defendants CHRISTOPHER MITCHELL WEBB; and SCHNEIDER NATIONAL CARRIERS, INC. disclose, within fifty (50) days of service, the information and materials described in Rule 194.2.

Respectfully submitted,

THE LAW OFFICE OF NHAN NGUYEN

/s/ Nhan Nguyen

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2500 West Loop South, Suite 340
Houston, Texas 77027
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ATTORNEYS FOR PLAINTIFF